

IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF PENNSYLVANIA

WALTER BECK CORPORATION d/b/a Civil Action No. 04-348-Erie
THE RAINBOW INN,

Plaintiff,

Judge Maurice B. Cohill, Jr.

vs.

SAFECO CORPORATION, AMERICAN
ECONOMY INSURANCE COMPANY, and
AMERICAN STATES INSURANCE COMPANY,

ORIGINAL

Defendants.

Deposition of:

Sharyn Beck

Taken by:

Defendants

Date:

November 11, 2006

Time:

9:00 a.m. - 10:58 a.m.

Location:

Holiday Inn Express,
The Villages
1205 Avenida Central
Lady Lake, Florida

Reported by:

Leslie Richmond, RPR

ZACCO & ASSOCIATES REPORTING SERVICES
605 East Robinson Street, Suite 430
Orlando, Florida 32801
(407) 425-6789

PERCADO-BAYONA, M. J.

DEFENDANT'S
EXHIBIT

N

1 A. I can stop and collect these.

2 Q. Sure you can.

3 A. Then I won't be telling you inaccurate information.

4 MR. LORENZ: I see it on there. What she's doing
5 is referring to the -- here, why don't we just have him
6 just show you the inventory, because that's what you're
7 looking for.

8 Q. Is that what you're looking for?

9 A. Yes, I am. I don't have the best memory in the
10 world.

11 Q. I have a one, two, three, four, five -- I have a
12 six page document bearing Bates stamp numbers 0032 through
13 0037. And I've premarked it Defendant's Exhibit A. It's
14 entitled at the top, Rainbow Inn - Inventory. Will that help
15 you?

16 A. Thank you. It certainly will. Thank you.

17 Q. Do you recognize the document?

18 A. Yes, I do. And I'm looking here to see if I was
19 correct when I said Garland. I think I am. Yes, I am. It's
20 a Garland and it's 60 inches in length.

21 Q. And then besides the Garland is there anything else
22 you recognize as being a major cooking appliance?

23 A. Major cooking appliance, yes. We had --

24 Q. Deep fat fryer?

25 A. Yes, we had a fryer. I would not have been able to

1 tell you the name of it. I see it here. It is a Hobart. It
2 was a large fryer.

3 Q. Anything else?

4 A. Any of the equipment I've listed here, I would --
5 was present at the time. Freezers, refrigerators.
6 Cooking-wise, that's my two large items.

7 Q. Okay. And it says, Steam Hot Food Table, Gas.

8 A. Yes.

9 Q. Is that sort of like -- well, tell me, what is
10 that? Is that a hot line or something?

11 A. That's what holds hot foods hot after you've
12 prepared them.

13 Q. Okay. Got it. Okay. Does that sum up the major
14 appliances for cooking?

15 A. Yes, sir.

16 Q. Incidentally, the Exhibit A that you have in front
17 of you that's titled, Rainbow Inn - Inventory, who prepared
18 the document?

19 A. I did.

20 Q. And did you type it up?

21 A. I would say I did, yes.

22 Q. And did you type it up from some other form? Like
23 did you type it up from your handwriting or something that
24 anybody gave you? I just wondered who made the list, who
25 developed it.

1 A. I originally developed it. We had a list of
2 equipment that we knew we had put in there, and from memory I
3 could tell you what was in there.

4 Q. When you say you had a list of equipment, what is
5 it that you are thinking of?

6 A. That I wrote when I -- after the loss, I had a
7 list.

8 Q. You sat down with a pen and paper and wrote up a
9 list from memory?

10 A. Yes.

11 Q. And then you typed it up, and this is the typed up
12 version, I take it?

13 A. I typed it up to submit it. I'm not sure if this
14 is my actual typing. I couldn't tell you that.

15 Q. Assuming it's the one that you submitted, this
16 would have been -- Exhibit A would have been your typed up
17 list from memory?

18 A. That's correct.

19 Q. And how did you determine the pricing and
20 quantities? Was that also from memory, or did you use
21 something to refresh your memory?

22 A. No. I did use something to refresh my memory.
23 Some of the items, I'm sure, were from memory. But other
24 items would have been from a restaurant supply catalog book.

25 Q. Okay. And did you look through a restaurant supply